

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL No. 2738 (FLW) (LHG)**

**NOTICE OF UNOPPOSED  
MOTION TO SEAL MATERIALS  
PURSUANT TO  
L. CIV. R. 5.2 AND L. Civ. R. 5.3**

*This document relates to:*

*Carol J. Williams, et al.,  
No. 3:19-cv-18778*

*Linda H. Hill, No. 3:18-cv-08344*

*Bobbie N. Landreth,  
No. 3:17-cv-11788*

*Michael Scroggins o/b/o Bertha M.  
Walton, No. 3:18-cv-12766*

**PLEASE TAKE NOTICE** that pursuant to Local Civil Rules 5.2 and 5.3, Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (collectively “JJCI” or “Defendants”) will move before this Court, on July 19, 2021, or as soon thereafter as counsel may be heard, for an Order sealing materials, specifically: sealing Exhibits 3, 5, 7, 8, 12, 17, and 18 to the Declaration of Jessica L. Brennan, Esq. in Support of Defendants’ Omnibus Motion for Summary Judgment filed on June 18, 2021, and the redacted corresponding portions of Defendants’ Brief in support thereof; and, sealing the redacted portions of Exhibits 9, 15, 20, 22, and 23

to Defendants' Omnibus Motion for Summary Judgment filed on June 18, 2021 that contain personal identifying information. Defendants have consulted with counsel for Plaintiffs, and Plaintiffs do not oppose this Motion.

**PLEASE TAKE FURTHER NOTICE** that in Support of this Motion, Defendants rely on the enclosed Memorandum in Support and the Proposed Order filed herewith.

Dated: June 18, 2021

By: /s/ Susan M. Sharko  
Susan M. Sharko  
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Johnson Consumer Inc.*